

HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SIXTY-01 ASSOCIATION OF APARTMENT
OWNERS, a Washington non-profit corporation,

Plaintiff,

v.

PUBLIC SERVICE INSURANCE COMPANY;
et al.,

Defendants.

NO. 2:22-CV-01373 JCC

STIPULATED MOTION AND
[~~PROPOSED~~] ORDER RE
DISCOVERY DEADLINES

NOTE ON MOTION CALENDAR:
July 15, 2024

I. STIPULATION

The Association and defendant Public Service Insurance Company have conferred regarding the deadlines set forth in the Court's Civil Trial Scheduling Order (Dkt. # 186). The parties are mediating this dispute on August 1, 2024, and agree that it makes sense to extend the current discovery cutoff and to set other discovery-related deadlines. Specifically, the parties request a 29-day extension of the current discovery cutoff, such that the discovery-related deadlines would be as follows:

Date

Event

September 20, 2024 Last day to disclose expert witnesses/reports

October 11, 2024 Last day to submit expert disclosure rebuttal reports

November 5, 2024 Deadline to file discovery-related motions

November 5, 2024 Discovery cutoff

All other deadlines and dates on the Court's Civil Trial Scheduling Order (Dkt. # 186) would remain unchanged.

DATED this 15th day of July, 2024.

ASHBAUGH BEAL

McCORMICK BARSTOW, LLP

By s/ Jesse D. Miller

By s/ Kevin D. Hansen

Jesse D. Miller, WSBA #35837

Patrick Fredette, WSBA #25300

jmiller@ashbaughbeal.com

patrick.fredette@mccormickbarstow.com

Zachary O. McIsaac, WSBA #35833

Kevin D. Hansen, *pro hac vice*

zmisaac@ashbaughbeal.com

kevin.hansen@mccormickbarstow.com

Attorneys for Plaintiff

Maria E. Valencia, *pro hac vice*

maria.valencia@mccormickbarstow.com

Nicholas H. Rasmussen, *pro hac vice*

nrasmussen@mccormickbarstow.com

Attorneys for Defendant Public Service

Insurance Company

II. ORDER

IT IS SO ORDERED.

DATED this 15th day of July 2024.



JUDGE JOHN C. COUGHENOUR
United States District Judge

///

1 Presented by:

2 ASHBAUGH BEAL

MCCORMICK BARSTOW, LLP

3 By s/ Jesse D. Miller

By s/ Kevin D. Hansen

Jesse D. Miller, WSBA #35837

Patrick Fredette, WSBA #25300

4 jmiller@ashbaughbeal.com

patrick.fredette@mccormickbarstow.com

Zachary O. McIsaac, WSBA #35833

Kevin D. Hansen, *pro hac vice*

5 zmcisaac@ashbaughbeal.com

kevin.hansen@mccormickbarstow.com

6 Attorneys for Plaintiff

Maria E. Valencia, *pro hac vice*

maria.valencia@mccormickbarstow.com

Nicholas H. Rasmussen, *pro hac vice*

7 nrasmussen@mccormickbarstow.com

Attorneys for Defendant Public Service

8 Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Patrick Fredette
patrick.fredette@mccormickbarstow.com

Kevin D. Hansen
kevin.hansen@mccormickbarstow.com

Maria E. Valencia
maria.valencia@mccormickbarstow.com

Nicholas H. Rasmussen
nrasmussen@mccormickbarstow.com

MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP

and

Emory C. Wogenstahl
emory@favros.com

FAIN ANDERSON VANDERHOEF ROSENDAHL O'HALLORAN SPILLANE PLLC
Attorneys for Public Service Insurance Company

The foregoing is true and correct to the best of my knowledge and belief.

Dated this 15th day of July, 2024, at Seattle, Washington.

s/ Teresa MacDonald

Teresa MacDonald